

<input type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
DEC 19 2013	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

1 Theodore Stevenson III (*pro hac vice*)
2 Texas State Bar No. 19196650
3 tstevenson@mckoolsmith.com
4 MCKOOL SMITH, P.C.
5 300 Crescent Court, Suite 1500
6 Dallas, Texas 75201
7 Telephone: (214) 978-4000
8 Fax: (214) 978-4044

9 Kevin Burgess (*pro hac vice*)
10 Texas State Bar No. 24006927
11 kburgess@mckoolsmith.com
12 Pierre Hubert (*pro hac vice*)
13 Texas State Bar No. 24002317
14 phubert@mckoolsmith.com
15 MCKOOL SMITH, P.C.
16 300 W. 6th St., Suite 1700
17 Austin, Texas 78701
18 Telephone: (512) 692-8700
19 Fax: (512) 692-8744

20 Michael D. Rounds
21 Nevada State Bar No. 4734
22 mrounds@watsonrounds.com
23 Ryan J. Cudnik
24 Nevada State Bar No. 12948
25 rcudnik@watsonrounds.com
26 Adam K. Yowell
27 Nevada State Bar No. 11748
28 ayowell@watsonrounds.com
29 WATSON ROUNDS
30 5371 Kietzke Lane
31 Reno, NV 89511-2083
32 Telephone: (775) 324-4100
33 Fax: (775) 333-8171

34 *Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

35 UNWIRED PLANET LLC, a Nevada
36 limited liability company,
37
38 Plaintiff,
39
40 v.
41
42 GOOGLE INC., a California corporation,
43
44 Defendant.

Case No. 3:12-cv-00504-MMD-VPC

**UNWIRED PLANET'S
MOTION TO SEAL
CASE MANAGEMENT
CONFERENCE STATEMENT**

1 Plaintiff Unwired Planet LLC ("Plaintiff") moves this Court for an order to seal Unwired
2 Planet's December Case Management Conference Statement, the Declaration of Kevin M.
3 Kneupper and the exhibits attached thereto. These documents, along with Plaintiff's December
4 Case Management Conference Statement, are filed concurrently with this motion. Pursuant to
5 the Protective Order entered in this matter (Dkt. 99), "All transcripts of depositions, exhibits,
6 answers to interrogatories, pleadings, briefs, and other documents submitted to the Court which
7 have been designated as Protected Information, or which contain information so designated, shall
8 be filed under seal in a manner prescribed by the Court for such filings." LR 10-5(b) provides in
9 part "...papers filed with the Court under seal shall be accompanied by a motion for leave to file
10 those documents under seal, and shall be filed in accordance with the Court's electronic filing
11 procedures." Plaintiff's December Case Management Conference Statement and the Declaration
12 of Kevin M. Kneupper (and the documents attached), contain and/or refer to information
13 designated by the parties as CONFIDENTIAL – OUTSIDE ATTORNEY'S EYES ONLY or
14 RESTRICTED CONFIDENTIAL – SOURCE CODE under the Protective Order.
15

16 Accordingly, to maintain the confidentiality of the documents and things pursuant to the
17 June 4, 2013 Protective Order, Plaintiff requests that the above referenced Unwired Planet's
18 December Case Management Conference Statement, Declaration of Kevin M. Kneupper and
19 attachments be filed under seal. A publicly available version of Plaintiff's December Case
20 Management Statement and Declaration and exhibits will be filed separately with the Court.
21

22
23

24
25

26
27

1 Dated: December 13, 2013

Respectfully submitted,

2 WATSON ROUNDS

3
4 /s/ Michael D. Rounds

5 Michael D. Rounds
6 Nevada State Bar No. 4734
7 mrounds@watsonrounds.com
8 Ryan J. Cudnik
9 Nevada State Bar No. 12948
10 rcudnik@watsonrounds.com
11 Adam K. Yowell
12 Nevada State Bar No. 11748
13 ayowell@watsonrounds.com
14 WATSON ROUNDS
15 5371 Kietzke Lane
16 Reno, Nevada 89511
17 Telephone: (775) 324-4100
18 Fax: (775) 333-8171

12 Theodore Stevenson III (*pro hac vice*)
13 Texas State Bar No. 19196650
14 tstevenson@mckoolsmith.com
15 MCKOOL SMITH, P.C.
16 300 Crescent Court, Suite 1500
17 Dallas, Texas 75201
18 Telephone: (214) 978-4000
19 Fax: (214) 978-4044

17 Kevin Burgess (*pro hac vice*)
18 Texas State Bar No. 24006927
19 kburgess@mckoolsmith.com
20 Pierre Hubert (*pro hac vice*)
21 Texas State Bar No. 24002317
22 phubert@mckoolsmith.com
23 MCKOOL SMITH, P.C.
24 300 W. 6th St., Suite 1700
25 Austin, Texas 78701
26 Telephone: (512) 692-8700
27 Fax: (512) 692-8744

22 **ATTORNEYS FOR PLAINTIFF**
23 **UNWIRED PLANET LLC**

24 **IT IS SO ORDERED**

25 
26 United States Magistrate Judge

27 **DATED:** *December 19, 2013*
28

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date a true and correct copy of the foregoing document, **UNWIRED PLANET'S MOTION TO SEAL DECEMBER CASE MANAGEMENT CONFERENCE STATEMENT**, will be served upon counsel of record via electronic mail through the United States District Court's CM/ECF system.

Dated: December 13, 2013

/s/ Jeff Tillison
An Employee of Watson Rounds